

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

ELIZABETH SINES, ET AL.,

Plaintiffs,

v.

JASON KESSLER, ET AL.,

Defendants.

Civil Action No. 3:17-cv-00072

Table of Exhibits

Exhibits referenced in the Memorandum in Support of the Motion for Summary

Judgment are referenced in numerical order, except for Deposition Exhibits. Deposition Exhibits are referenced as Hill (or Tubbs) Dep. Ex. X. Deposition exhibits are listed under the Deposition where they were introduced.

Exhibits 35, 37, 38, 43, 45, 46, 57 are videos published on the internet and publicly available as of August 7, 2020. Counsel will mail digital copies of those exhibits to the Court on Friday, August 7, 2020 and opposing counsel upon request.

Exhibit 39 is a video that was produced during discovery. It will be provided to the court by mail and opposing counsel upon request. Exhibit 42 is a video published on the internet and publicly available as of August 7, 2020. Counsel has not been able to obtain a digital copy of the video to date. Once a digital copy is secured, it will be filed with the court and sent to opposing counsel upon request.

Hill Dep. Ex 29 is a video that was introduced as an exhibit during Hill's deposition. It will be provided to the court by mail and opposing counsel upon request. Tubbs Dep. Exs. 13,

17, and 20 are videos that were introduced during Tubbs' deposition. They will be provided to the court by mail and opposing counsel upon request.

Exhibit 56 would not upload to the Court's efiling system. Counsel has included a digital copy and will file it with the court along with the digital copies of the videos.

Exhibits:

1. Michael Hill's Response to Plaintiff's Second Set of Interrogatories
2. Michael Hill Deposition Transcript
 - a. Hill Dep. Ex. 4—Hill Pledge
 - b. Hill Dep. Ex. 5—Southern Defense Force
 - c. Hill Dep. Ex. 6—League and UTR
 - d. Hill Dep. Ex. 8—Email from Hill
 - e. Hill Dep. Ex. 15—Email re UTR
 - f. Hill Dep. Ex. 18—Crews discussion
 - g. Hill Dep. Ex. 19—Hill email re Torch March
 - h. Hill Dep. Ex. 22—Tubbs text re contacting law enforcement
 - i. Hill Dep. Ex. 24—email re Antifa violence
 - j. Hill Dep. Ex. 25—Facebook post
 - k. Hill Dep. Ex. 26—Hill message re Antifa violence
 - l. Hill Dep. Ex. 27—Thomey email
 - m. Hill Dep. Ex. 29—video of Market Street clash with Antifa
 - n. Hill Dep. Ex. 31—Hill tweet
3. Michael Tubbs Deposition Transcript
 - a. Tubbs Dep. Ex. 13—video of Market Street clash
 - b. Tubbs Dep. Ex. Ex. 16—photo of Tubbs at Market Street clash
 - c. Tubbs Dep. Ex. Ex. 17—video of Tubbs at top of stairs in park
 - d. Tubbs Dep. Ex. Ex. 20—DeAndre Harris fight
4. Robert Ike Baker Deposition Transcript
5. Bradley Griffin Deposition Transcript
6. "What is the League of the South"—website posting; <https://leagueofthesouth.com/what-is-ls/>
7. League of the South webpage Homepage; <https://leagueofthesouth.com/>

8. "A statement of New Orleans and Lee Circle"—website posting;
<https://leagueofthesouth.com/a-statement-on-new-orleans-and-lee-circle/>
9. "League of the South in Pikeville, Kentucky"—website posting;
<https://leagueofthesouth.com/league-of-the-south-in-pikeville-kentucky/>
10. "A few notes on an American race war"—website posting;
<https://leagueofthesouth.com/a-few-notes-on-an-american-race-war/>
11. "Hardly peaceful, but no violence as white nationalists, protesters yell in Pikeville"—Lexington Herald Leader; <https://www.kentucky.com/news/state/article147594424.html> (article and video)
12. "Jihad in Tennessee"—website posting; <https://leagueofthesouth.com/jihad-in-tennessee/>
13. NCRIC Advisory Bulletin; <https://national-justice.com/sites/default/files/2020/07/10/berkely.pdf>
14. Congressional Research Service—Antifa Article;
<https://crsreports.congress.gov/product/pdf/IF/IF10839/2>
15. "The League and the Unite the Right rally"—website posting;
<https://leagueofthesouth.com/the-league-and-the-unite-the-right-rally/>
16. "League of the South statement on Charlottesville"—website posting;
<https://leagueofthesouth.com/league-of-the-south-statement-on-charlottesville/>
17. Michael Tubbs Discord chat
18. Robert Ike Baker Discord on 2017-08-06
19. Charlottesville Police Department – internal memo - City000000941 - 943
20. "League of the South with be at Unite the Right"—website posting;
<https://leagueofthesouth.com/league-will-be-at-unite-the-right-rally-12-august-charlottesville-va/>
21. Charlottesville Police Department – internal memo - City000000340
22. Charlottesville Police Department – internal memo - City000000341
23. Charlottesville Police Department – internal memo - City000000342

24. Charlottesville Police Department – internal memo - City000000449
25. Charlottesville Police Department – internal memo - City000000446
26. Charlottesville Police Department – internal memo - City000000850
27. Charlottesville Police Department – internal memo - City000000851
28. Charlottesville Police Department – internal memo - City000000852
29. Charlottesville Police Department – internal memo - City000000941
30. Charlottesville Police Department – internal memo - City_00001477
31. Charlottesville Police Department – internal memo - City_00001478
32. [empty]
33. Charlottesville Police Department – internal memo - City000000323
34. Charlottesville Police Department – internal memo - City000000150
35. <https://www.youtube.com/watch?v=JEpDiM0M610&t=477s> at 6:25-6:43, 7:16-7:21, 9:20-9:31, 10:45-10:59
36. Image of Antifa blockage
37. https://www.youtube.com/watch?v=0s8R_cGgvFY
38. https://archive.org/details/archiveteam_videobot_twitter_com_896384861187051520/128_0x720.ts
39. Journalist video of Rally—NOCUSTODIAN00044709
40. Image of Counter protester sign
41. Image of Counter protester sign
42. https://ia800805.us.archive.org/26/items/periscope-1zqKVRpXbkPKB/BuzzFeed_News_-_The_KKK_neo-Nazis_and_other_hate_groups_are_in_Charlottesville_for_the_Unite_the_Right_rally.-1zqKVRpXbkPKB.ogv at 0:59-2:33, 0:49-1:09, 3:10-3:30, 3:32-3:52, 4:28-4:41

43. <https://www.youtube.com/watch?v=1FBsxSVC3-A>
44. Charlottesville Police Department – internal memo - City000000107
45. <https://www.youtube.com/watch?v=qg8TRc8O7dM&feature=youtu.be>
46. <https://www.youtube.com/watch?v=OcPiHEZqVxQ>
47. Charlottesville Police Department – internal memo - City000000108
48. Charlottesville Police Department - internal memo - City000000323
49. [empty]
50. Image of rally goer injury
51. Tallahassee Democrat news article;
<https://www.tallahassee.com/story/news/2018/01/27/heavy-law-enforcement-presence-keeps-league-south-rally-peaceful-white-supremacists/1072048001/>
52. “A Statement on legal matter regarding League events in Middle Tennessee”—website posting; <https://leagueofthesouth.com/a-statement-on-legal-matters-regarding-league-events-in-middle-tennessee-28-october-2017/>
53. “The League and the National Front at Shelbyville”—website posting;
<https://leagueofthesouth.com/the-league-and-nationalist-front-at-shelbyville-28-october/>
54. [empty]
55. “The League in Knoxville but no Antifa”—website posting;
<https://leagueofthesouth.com/the-league-in-knoxville-but-no-antifa/>
56. Heaphy Report (document would not upload to Court’s e-filing system)
57. https://www.youtube.com/watch?v=_TWCEV5U09c&feature=youtu.be
58. Image of rally goer injury
59. Affidavit/Declaration of Michael Hill
60. Affidavit/Declaration of Michael Tubbs

61. Affidavit/Declaration of Robert Ike Baker

62. Plaintiff Wispelwey Deposition Transcript